

EXHIBIT J
(Consent Order)

STATE OF NEVADA
DEPARTMENT OF BUSINESS AND INDUSTRY
DIVISION OF MORTGAGE LENDING

Before the Commissioner of the Division of Mortgage Lending

In the Matter of:

ALLRISE DIRECT LENDING LLC D/B/A
ALLRISE FINANCIAL GROUP, INC.,
Mortgage Broker License No. 4818,
NMLS ID No. 1710040,

and

ROYAL DEVELOPMENT INC.
Mortgage Broker License No. UNL,

and

VLADIMIR NIKOLAYEVICH EVSEEV,
NMLS ID No. 1729027,

Respondents.

Order No. 2018-010

Case No. 2018-010

CONSENT ORDER REQUIRING COMPLIANCE,
IMPOSING AN ADMINISTRATIVE FINE
AND ASSESSING ADMINISTRATIVE COSTS

Issued and Entered,
This 7th day of June, 2019,
By Cathy Sheehy,
Commissioner

The Commissioner of the State of Nevada, Department of Business and Industry, Division of Mortgage Lending (the "Commissioner") having been statutorily charged with the responsibility and authority to administer and enforce Chapter 645B of the Nevada Revised Statutes, 645B.010 *et seq.* ("the Statute"), and Chapter 645B of the Nevada Administrative Code, NAC 645B.001 *et seq.* ("the Regulation") (collectively, "the Act"), governing the licensing and conduct of mortgage brokers and mortgage agents doing business in the State of Nevada; and,

...

1 The Commissioner having been vested with general supervisory power and control over all
2 mortgage brokers and mortgage agents doing business in the State of Nevada pursuant to the Statute;
3 and,

4 The Commissioner having been further vested with broad authority to conduct investigations to
5 determine whether any person is violating or has violated any provision of the Act; and,

6 The Division of Mortgage Lending (the "Division") having received information indicating that
7 ALLRISE DIRECT LENDING LLC ("ALLRISE DIRECT") D/B/A ALLRISE FINANCIAL GROUP,
8 INC. ("ALLRISE FINANCIAL"), ROYAL DEVELOPMENT INC. ("ROYAL DEVELOPMENT"),
9 and VLADIMIR NIKOLAYEVICH EVSEEV ("EVSEEV") (collectively, the "RESPONDENTS") are
10 or were engaged in activity requiring licensure as a mortgage broker under the Statute, including
11 advertising services as a provider of real-estate secured, private-money loans or direct lending services
12 in the State of Nevada; and,

13 The Division having commenced an investigation of RESPONDENTS' business practices
14 pursuant to NRS 645B.060(2)(c), and having determined, from that investigation, that RESPONDENTS
15 were engaged in activity requiring licensure as a mortgage broker under the Statute; and,

16 The Division staff having reported the results of its investigation to the Commissioner; and,
17 The Commissioner of the State of Nevada, Department of Business and Industry, Division of Mortgage
18 Lending (the "Commissioner") having been statutorily charged with the responsibility and authority to
19 administer and enforce Chapter 645B of the Nevada Revised Statutes, NRS 645B.010 *et seq.* ("the
20 Statute"), and Chapter 645B of the Nevada Administrative Code, NAC 645B.001 *et seq.* ("the
21 Regulation") (collectively "the Act"), governing the licensing and conduct of mortgage brokers and
22 mortgage agents in the State of Nevada;

23 RESPONDENTS having been served on or about December 4, 2018, in accordance with NRS
24 233B.127(3), with an ORDER TO CEASE AND DESIST, ORDER IMPOSING AN
25 ADMINISTRATIVE FINE AND INVESTIGATIVE COSTS AND NOTICE OF OPPORTUNITY FOR
26 ADMINISTRATIVE HEARING ("CEASE AND DESIST ORDER") providing RESPONDENTS with
27 (1) notice of facts or conduct which warrant disciplinary action against RESPONDENTS, and (2) notice
28 of opportunity for administrative hearing; and,

1 An informal conference having been conducted by the Division with RESPONDENTS and their
2 attorneys on January 29, 2019, concerning this matter;

3 RESPONDENTS having had opportunity to consult with legal counsel of their choosing
4 concerning this matter;

5 The Division and RESPONDENTS having conferred concerning this matter; and

6 The Commissioner having made the following FINDINGS and CONCLUSIONS based upon the
7 foregoing and the books and records of the Division:

8 1. The Commissioner has jurisdiction and authority to issue this Consent Order in this
9 matter, pursuant to the Nevada Administrative Procedures Act ("NAPA"), NRS 233B.010 *et seq.*, and
10 the Mortgage Brokers and Mortgage Agents Act, NRS 645B.010, *et seq.*

11 2. All required notices have been issued in this matter, and the notices and service thereof
12 were appropriate and lawful in all respects.

13 3. The terms of this Consent Order are a reasonable resolution of this matter and in the
14 public interest.

15 4. All applicable provisions of NAPA and NRS 622 have been met.

16 5. RESPONDENTS violated NRS 645B.900 concerning offering or providing any of the
17 services of a mortgage broker or mortgage agent or otherwise engaging in, carrying on or holding
18 himself or herself out as engaging in or carrying on the business of a mortgage broker or mortgage agent
19 without first obtaining the applicable license issued pursuant to this chapter, unless the person is
20 properly exempt from licensure.

21 NOW, THEREFORE, IT IS HEREBY ORDERED that:

22 1. RESPONDENTS shall henceforth fully comply with the provisions of the Act and shall
23 CEASE AND DESIST from any and all violations of the Act.

24 2. RESPONDENTS shall pay to the Division an ADMINISTRATIVE FINE in the amount
25 of \$15,000.00. The administrative fine shall be and is due to the Division no later than **June 10, 2019**
26 (as reflected in the attached invoice) and shall be accompanied by the signed and notarized
27 VOLUNTARY CONSENT as attached.

28 ...

1 3. RESPONDENTS shall pay to the Division its ADMINISTRATIVE COSTS in the
2 amount of \$2,595.00. The investigative costs shall be and are due to the Division no later than **June 10,**
3 **2019** (as reflected in the attached invoice) and shall be accompanied by the signed and notarized
4 VOLUNTARY CONSENT, as attached.

5 4. Failure to abide by the foregoing terms as set forth in this Consent Order shall render the
6 terms of this Consent Order voidable at the discretion of the Commissioner, thereby subjecting
7 RESPONDENTS to all disciplinary measures authorized under the Act, including those described in the
8 CEASE AND DESIST ORDER of which RESPONDENTS were previously notified in this matter.

9 5. This Consent Order shall be and is effective and enforceable on the date that it is issued,
10 as shown in the caption hereof.

11 6. This Consent Order shall remain effective and enforceable until terminated, modified, set
12 aside, or suspended in writing by the Commissioner.

13 7. The Commissioner specifically retains jurisdiction over the matters contained herein and
14 has the authority to issue such further order(s) as the Commissioner shall deem just, necessary, and
15 appropriate to enforce the Act and protect the public.

16 IT IS SO ORDERED.

17
18 DIVISION OF MORTGAGE LENDING

19
20 By 

 CATHY SHEEHY, COMMISSIONER